

Fill in this information to identify the case:

Debtor 1

Robert Smith

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court for the: Western District ofPennsylvania
(State)Case number 20-10229-JCM

Form 4100R

Response to Notice of Final Cure Payment**10/15**

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage InformationName of Creditor: The Bank of New York Mellon f/k/a The Bank of New York, as
successor in interest to JPMorgan Chase Bank, as Trustee for
Centex Home Equity Loan Trust 2004-C

Court claim no. (if known):

2Last 4 digits of any number you use to identify the debtor's account: XXXXXX3753

Property address:

10323 Clifton Drive

Number Street

Lake City Borough, PA 16423

City State ZIP Code

Part 2: Pre-petition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim. Creditor asserts that the total pre-petition amount remaining unpaid as of the date of this response is: \$_____

Part 3: Post-petition Mortgage Payment

Check one:

- Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next post-petition payment from the debtor(s) is due on: 08/01/2025
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) **are not current** on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- | | | |
|-----------------------------------------------------------------|---------|-------------|
| a. Total post-petition payments due: | (a) \$ | <u>0.00</u> |
| b. Total fees, charges, expenses, escrow, and costs outstanding | +(b) \$ | <u>0.00</u> |
| c. Total. Add lines a and b | (c) \$ | <u>0.00</u> |

Creditor asserts that the debtor(s) are contractually
Obligated for the post-petition payment(s) that first became
Due on:

MM/DD/YYYY

Debtor 1

Robert Smith

First Name Middle Name Last Name

Case number 20-10229-JCM

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box:

- ☐ I am the creditor
☒ I am the creditor's authorized agent

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X

/s/Charles L. Kennon

Signature

Date 06/17/2025

Print

Charles L. Kennon

First Name Middle Name Last Name

Title Authorized Agent for the Creditor

Company

McCalla Raymer Leibert Pierce, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address

325 Chestnut Street, Suite 725

Number Street

Philadelphia, PA 19106

City State Zip Code

Contact phone 725-253-2312

Email Charles.Kennon@mccalla.com

In Re: Robert Smith

Bankruptcy Case No.: 20-10229-JCM
Chapter: 13
Judge: John C Melaragno

CERTIFICATE OF SERVICE

I, Charles L. Kennon, of McCalla Raymer Leibert Pierce, LLP, 325 Chestnut Street, Suite 725, Philadelphia, PA 19106, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within Response to Notice of Final Cure Payment filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Robert Smith
10323 Clifton Drive
Lake City, PA 16423

Paul W. McElrath, Jr., Esq. *(served via ECF Notification)*
McElrath Legal Holdings, LLC.
1641 Saw Mill Run Boulevard
Pittsburgh, PA 15210

Ronda J. Winnecour, Trustee *(served via ECF Notification)*
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee *(served via ECF Notification)*
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 06/17/2025 By: /s/Charles L. Kennon
(date) Charles L. Kennon,
Authorized Agent for the Creditor